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November 9, 2022

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Reynolds et al. v. Marymount Manhattan College*  
Case No.: 22-cv-6846

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Dear Judge Schofield:

As Your Honor is aware, this firm represents the interests of Defendant Marymount Manhattan College (“Defendant”) in the above-referenced action. We write jointly with Plaintiff and pursuant to Section B.2. of Your Honor’s Individual Practice Rules to respectfully request a stay of this matter, a stay of Defendant’s time to answer, move, or otherwise respond to the Complaint, and an adjournment of the initial conference presently scheduled for November 16, 2022.

Defendant’s deadline to answer, move or otherwise respond to the Consolidated Complaint is presently November 11, 2022. *See* Dkt. No. 18. The parties have been discussing potential resolution of the matter and are in the process of scheduling a mediation. Given mediator availability and the upcoming holidays, the mediation is likely to take place in January 2023. Thus, the parties respectfully request that the matter be stayed and that Defendant’s time to answer, move or otherwise respond to the Complaint be stayed up to and including January 31, 2023 so that the parties can focus their efforts on discussing potential resolution of the matter and the upcoming mediation. The parties also respectfully request that the initial conference, presently scheduled for November 16, 2022, be adjourned until after January 31, 2023 or at another date as is convenient for the Court. The parties will continue to keep the Court apprised as to the status of these efforts and the outcome of the mediation.

This is the first request by Defendant for an extension of time to answer, move or otherwise respond to the Consolidated Complaint. In addition to the deadline for Defendant to answer, move or otherwise respond to the Complaint, as set forth above, this request also affects the date of the initial conference, presently scheduled for November 16, 2022. As noted above, Plaintiffs consent to and join in this request.

Accordingly, we respectfully request the Court enter a stay of this matter and a stay of Defendants' time to answer, move or otherwise respond to the Complaint up to and including January 31, 2023, and that the Court adjourn the initial conference until after January 31, 2023 or at another date as is convenient for the Court, together with such other and further relief as the Court may deem proper.

We appreciate the Court's attention to this matter. Should Your Honor have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP  
*Attorneys for Defendants Mason Tenders Council  
Welfare, Annuity and Pension Funds*

/s/ John Mills

John T. Mills

MILBERG COLEMAN BRYSON PHILLIPS  
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*Attorneys for Plaintiff*

/s/ Gary Klinger

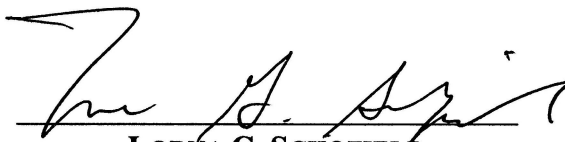
Gary M. Klinger

CC: Counsel for all parties via ECF

Application **GRANTED IN PART, DENIED IN PART**. The anticipated use of any alternative dispute resolution mechanism does not provide cause to stay discovery or any other deadlines. The request for a stay of this matter and adjournment of the initial pretrial conference is **DENIED**. The request for a stay of the deadline for Defendants to answer, move or otherwise respond to the Complaint is **GRANTED IN PART**. In light of the impending deadline, Defendants may answer, move or otherwise respond to the Complaint by **November 15, 2022**.

The joint letter and proposed case management plan was due on November 9, 2022. The parties have not filed these documents. The parties shall file the required materials as soon as possible, and no later than **November 11, 2022**. So Ordered.

Dated: November 10, 2022  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE